

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 18-16779-ELF
Craig R. Fulton	:	Chapter 13
Debtor	:	
	:	
First Guaranty Mortgage Corporation c/o	:	
Rushmore Loan Management Services, LLC	:	
Movant	:	
vs.	:	
	:	
Craig R. Fulton and Erneyka Fulton (Non-	:	
filing Co-Debtor)	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

PRAECIPE TO WITHDRAW MOTION FOR RELIEF FROM STAY

TO THE CLERK:

Please mark the Motion for Relief from Stay, filed on September 10, 2020 at Doc. #32, as withdrawn without prejudice.

Respectfully submitted,

/s / Antonio Bonanni, Esquire

Antonio, Bonanni, Esquire

Hladik, Onorato & Federman, LLP

Attorney I.D. # 322940

298 Wissahickon Avenue

North Wales, PA 19454

Phone 215-855-9521

Email: abonanni@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 18-16779-ELF
Craig R. Fulton	:	Chapter 13
Debtor	:	
	:	
First Guaranty Mortgage Corporation c/o	:	
Rushmore Loan Management Services, LLC	:	
Movant	:	
vs.	:	
	:	
Craig R. Fulton and Erneyka Fulton (Non-	:	
filing Co-Debtor)	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

CERTIFICATE OF MAILING

I, Antonio, Bonanni, certify under penalty of perjury that I served a copy of the Praecipe to Withdraw Motion for Relief from Stay to the parties at the addresses shown below on **11/24/2020**.

The types of service made on parties were: Electronic Notification and First Class Mail:

Brad J. Sadek, Esquire
Via ECF
Attorney for Debtor

William C. Miller, Esquire
Via ECF
Trustee

Craig R. Fulton
Erneyka Fulton
168 Sparks Street
Philadelphia, PA 19120
Via First Class Mail
Debtor and Non-Filing Co-Debtor

Dated: 11/24/2020

/s / Antonio Bonanni, Esquire
Antonio, Bonanni, Esquire
Hladik, Onorato & Federman, LLP
Attorney I.D. # 322940
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521
Email: abonanni@hoflawgroup.com